

1 Q. So this was not a document that was sent
2 to the customer, correct?

3 A. Correct.

4 Q. Do you know why you wrote this
5 handwritten -- these handwritten notes on or about
6 April 28, 2006?

7 A. Because I faxed this document to them to
8 get the information truncated, and I wrote what I
9 wanted them to do and I put the date and time on it.

10 Q. Do you believe that this reflects the fact
11 that you had already talked to the customer about
12 truncating on their machine?

13 A. Yes.

14 Q. If you had talked to the customer about
15 truncating on their machine on April 28, 2006, would
16 you have included that in the notes for the
17 customer?

18 A. In a perfect world, yes. I can't say for
19 sure whether I did or not. I -- you know, I don't
20 see those notes.

21 Q. As you sit here today, do you have a
22 specific recollection of having talked to anybody at
23 Bacci Cafe on April 28, 2006 or about that date
24 regarding truncating on their machine?

1 A. No, I don't.

2 Q. And again, this was something -- the
3 truncating on their machine was not something that
4 you could do from your desk in Illinois? You had to
5 actually send this notation to the processing center
6 in Arizona?

7 A. They had to do the work in Arizona, push
8 all the buttons. Then I would talk to the customer
9 again. They would hit the button. Initialize. It
10 would make the phone call. And then it would pick
11 up the parameters.

12 Whether it worked or not, you know, it's
13 hit or miss because it's a computer thing over the
14 phone, you know, so I couldn't tell you for sure
15 whether it worked or not.

16 Q. Okay. And as you sit here today, you
17 have --

18 MR. NORA: Objection. Has the Witness
19 finished his answer?

20 MS. ARRANZ: Sorry.

21 THE WITNESS: Yes, I'm fine. Thank you,
22 sir.

23 BY MS. ARRANZ:

24 Q. As you sit here today, you don't have any

1 personal knowledge what would have happened after
2 you indicated to the folks in Arizona that they
3 needed to truncate. You have no personal knowledge
4 what happened thereafter, correct?

5 A. No.

6 Q. I am correct?

7 A. You are correct.

8 Q. Is it possible, Mr. Porch, that you could
9 have sent this information to Arizona before you
10 contacted the customer regarding truncating on their
11 machine?

12 MR. NORA: Objection to the speculative
13 element.

14 THE WITNESS: I -- I don't know. I really
15 couldn't tell you one way or another. You know, it
16 was a lot of phone calls.

17 BY MS. ARRANZ:

18 Q. Okay. But it is a possibility that you
19 would have, for example, sent a note like this to
20 Arizona to the processing center regarding
21 truncating without having spoken to the customer
22 first, correct?

23 A. I would have talked to the customer to let
24 them know they had to truncate their machine before

1 I would have sent this off.

2 Q. Let me ask you a separate question. Do
3 you know if you could have made these handwritten
4 notes on April 28, 2006, regarding truncating for
5 yourselves or for folks at National Translink and
6 not faxed it on to Arizona?

7 A. No because when I faxed it, I would write
8 the date again. That is why the date is up there
9 twice. Time when I talked to him was 10:55 a.m. and
10 then I show that I faxed it. I put the -- my
11 initials and the date.

12 Q. Do you know why National Translink would
13 have a copy then of this document in its files?

14 A. I imagine to protect themselves on all the
15 truncation. I'm sure they have it on a lot of
16 customers. Anybody I did send a MCMTER on, I put it
17 in the file.

18 Q. Okay. So you would make a copy for the
19 file and fax it on --

20 A. Once I faxed it, I would take that copy
21 and I put it in their file or to be filed -- in the
22 bin to be filed in people's file because if it was
23 sent on -- I have my name on it. I put it in the
24 to-be-filed-bin.

1 MR. ANDREOLI: I'm going to make a
2 foundation objection with respect to the prior
3 question dealing with why National Translink would
4 want this document in its file.

5 BY MS. ARRANZ:

6 Q. In looking at this Page 47, do you know
7 whether or not Bacci Cafe would have been one of the
8 companies on that list you were telling me about?

9 A. I couldn't tell you for sure whether they
10 were on or not. I knew there was a list, but there
11 is -- Like I said, there was quite a few people on
12 there.

13 Q. Did you make any notations on the list
14 that you had with these customer names, any notation
15 after you had spoken to somebody at -- at the
16 company regarding truncation?

17 A. On the list that I had, I would write down
18 if I talked to them and put my initials. I mean, if
19 it was done, I'm sure I wrote done on it.

20 And could I use the rest room?

21 MS. ARRANZ: Yeah, let's take a break.

22 (Whereupon, a brief recess was
23 taken.)

24

1 BY MS. ARRANZ:

2 Q. Before we took our break, you were
3 speaking a little bit -- we were talking about that
4 list that you got from National Translink with those
5 customers that you were supposed to contact
6 regarding truncation.

7 You stated that from your recollection
8 what you would have done with that list that you had
9 of customers was that you would write down if you
10 talked to them with your initials and potentially
11 put down done next to it or something like that?

12 A. Or something to that sort, yes.

13 Q. And that is your best recollection of what
14 you did with the list that you received regarding,
15 you know, contacting customers?

16 A. Yes.

17 Q. Also if you would look at the next page on
18 Exhibit 4, it's Page 48. Look through that and then
19 we are going to talk about that page in a little bit
20 more detail, but look at it first.

21 A. Okay.

22 Q. Okay. Now it looks to me like the
23 typewritten portion of Page 48 of Exhibit 4 is the
24 same as that previous Page 47; is that right?

1 A. Yes.

2 Q. All right. And then at the bottom there
3 is some more handwritten notes here. Let me ask you
4 generally, though, why -- Strike that.

5 MR. NORA: I object to the opinion on
6 whether they are the same and look the same.

7 BY MS. ARRANZ:

8 Q. Okay. As you sit here today --

9 MR. ANDREOLI: Counsel, I apologize.
10 Doug, because you have both documents in front of
11 you -- you did that quickly. Would you like to take
12 a minute and compare the two? I'm not asking you
13 whether your opinion is the same or different. I'm
14 just asking you --

15 THE WITNESS: Yeah, let me take a minute
16 and look at it here and see if there is any
17 differences.

18 MR. ANDREOLI: Okay.

19 THE WITNESS: All the printed information
20 seems to be the same as the other here.

21 BY MS. ARRANZ:

22 Q. Okay. The quality of the typewritten
23 portions of these pages is different, though. Do
24 you notice that?

1 A. The font on the lettering?

2 Q. Uh-huh.

3 A. Yes.

4 Q. In fact, on Page 48, there is -- It looks
5 to be if you look at the very, very bottom, under
6 the Bates number and under the handwritten notes, it
7 looks like there is what appears to be, like, fax
8 transmission information. Do you see that?

9 A. Yes.

10 Q. Okay. And that is -- That fax
11 transmission information is not on Page 47, correct?

12 A. Correct.

13 Q. But the information within the typewritten
14 notes, that is the same on Page 48 as it was on Page
15 47, correct?

16 A. Correct.

17 Q. Okay. So this regards Bacci Pizzeria
18 again, correct?

19 A. Correct.

20 Q. And at the bottom there is handwriting.
21 Can you tell me whose handwriting this is at the
22 bottom of Page 48 of Exhibit 4, please?

23 A. On the bottom or underneath the date
24 7/13/06. "Please truncate. Let me know when this

1 is done so I can have them initialize, thanks,
2 Doug," is mine.

3 Q. Okay. Do you know whose handwritten note
4 it is that says, truncation is complete? It looks
5 like somebody's signature, and then 7/14/06. Do you
6 know whose handwritten notes those are?

7 A. To know who they are personally? No, it
8 would have to be someone in Arizona.

9 Q. Do you know whose name is underneath
10 truncation is complete on Page 48?

11 A. No.

12 Q. And when you say it had to be somebody in
13 Arizona, you are talking about somebody that --

14 A. Somebody in technical support in Arizona.

15 Q. But as you sit here today, you have no
16 personal knowledge whether or not that handwritten
17 note was made by somebody in technical support in
18 Arizona, correct?

19 A. I have no knowledge of who -- No. It
20 looks like it was faxed back. I have no knowledge
21 of who it is.

22 Q. Do you know why you made this note,
23 "Please truncate, and let me know when done so I can
24 have them initialize, thanks, Doug"? Do you know

1 why you made those handwritten notes?

2 A. Because I faxed off the parameters and
3 they faxed it back to me. We can call them and say
4 hit the initialize button. That makes the machine
5 do a phone call, so if they hit it with a button on
6 the machine that says initialize, it will make a
7 phone call out and pick up any changes made.

8 Q. So is this an instruction to somebody in
9 Arizona? Please truncate and let me know when done
10 so I can have them initialize?

11 A. Correct.

12 Q. And you believe that this was a note that
13 you had faxed to somebody in Arizona on or about
14 July 13, 2006, correct?

15 A. Correct.

16 Q. Do you know, Doug, why -- I mean, we were
17 talking about Page 47, and you -- That is dated
18 April 28, 2006, and it says, please truncate,
19 thanks, Doug, but then three months -- almost three
20 months later, there is a separate note regarding
21 please truncate and let me know when done.

22 Do you know why you have these two
23 different handwritten notes on two different dates
24 regarding Bacci Cafe?

1 A. It looks like it didn't take. Their
2 truncation wasn't done when it was supposed to be
3 done, so we tried to do it again.

4 MR. ANDREOLI: Objection to speculation.

5 THE WITNESS: I mean, that's all I can
6 say.

7 BY MS. ARRANZ:

8 Q. I'm just asking you --

9 A. I don't know for sure why. I just know
10 that the work order came across my desk again, so I
11 did it.

12 Q. Okay. So as you sit here today, I'm just
13 asking for your best understanding looking at these
14 notes. I know it's been a couple years, so you
15 know, I'm just asking for your best understanding.
16 You've obviously given that to me, and you are
17 saying that you also think that probably what
18 happened is you got a work order that came across
19 your desk?

20 A. Right.

21 Q. What exactly would that have been? What
22 do you mean by that?

23 A. Someone called.

24 Q. Okay.

1 A. Or they called in and I wrote it up. You
2 know, hey, my machine is not truncated, and I had to
3 go through the steps again to get it done.

4 You know, it's like I was handling the
5 customer service queue.

6 Q. Okay.

7 A. The phone rings. You deal with it. Then
8 you go on to the next thing.

9 Q. Okay. But you don't know one way or
10 another whether or not somebody called from the
11 restaurant regarding problems with truncation,
12 correct?

13 A. I couldn't tell you one way or another.

14 Q. And in fact, you don't know one way or
15 another if this was kind of a directive brought in
16 by somebody in Arizona, correct?

17 A. I wouldn't -- No, I wouldn't know one way
18 or another where it came from. I just --

19 Q. And I know you were talking about the
20 calling in and the dialing in and that sort of thing
21 and that was the instruction for please truncate.

22 When you wrote this note, when you -- this
23 note, please truncate and let me know when done, you
24 said that it was a directive or request made to

1 Arizona, correct?

2 A. Correct.

3 Q. And what did you think was going to happen
4 after you sent this information or faxed this
5 information?

6 A. That I would get a return fax and I would
7 call them and say hit initialize.

8 Q. Okay. Who would have to -- When you say,
9 hit initialize, who would have to initialize?

10 A. The person who is standing by their credit
11 card machine.

12 Q. So somebody --

13 A. Somebody at Bacci Pizzeria or the business
14 would do it, would physically have to reach up into
15 the corner and hit a button that says initialize on
16 their credit card machine and let it make a phone
17 call out like you would download anything over a
18 modem.

19 Q. I'm sorry. So tell me if I'm wrong, and
20 I'm sure you will. You send this fax saying, please
21 truncate and let me know when done so I can have
22 them initialize. You believe you faxed that to
23 Arizona, correct?

24 A. Correct.

1 Q. Then you believe what had to happen next
2 was that they would make a notation, do something in
3 Arizona and fax something back to you, correct?

4 A. Correct.

5 Q. And at that point would you contact
6 somebody at the company to have them initialize?

7 A. And I would call back to the company and
8 say, "Hi, I need you to hit the button on your
9 credit card machine."

10 Q. Okay. This notation of truncation is
11 complete, do you know what that means? I know it's
12 not your handwriting. I'm just asking for your best
13 understanding.

14 A. This means that Arizona has put all the
15 necessary stuff into the program to make it only
16 show the last four numbers and that they are ready
17 to hit the initialize button.

18 Q. Okay. At this point from your
19 understanding when Arizona has done this change or
20 whatever they need to upload, has -- is the machine
21 that the company has, is it able at that point in
22 time to be able to truncate numbers, do you know?

23 A. I don't know for sure.

24 Q. Okay.

1 A. There has been cases with machines that
2 you do the truncation, you hit the button and it
3 won't take. At that point they need to replace it.

4 Q. Okay. But from your understanding there
5 needs to be something physically done by somebody at
6 the company, correct?

7 A. Correct.

8 Q. After this is done --

9 A. Correct.

10 Q. -- by Arizona?

11 As you sit here today, do you believe this
12 document, Page 48 of Exhibit 4, that this was a
13 document that you received back from Arizona by fax?

14 A. Looking at -- seeing it's been initial --
15 it's been signed and dated. Yeah, it looks like it,
16 especially from the fax number on the bottom or the
17 date. It looks like it came back from Arizona.

18 Q. Okay. Do you know if you had any
19 conversations with anybody at Bacci Cafe on July 13
20 or July 14th regarding truncating of their -- Strike
21 that.

22 Do you know as you sit here today whether
23 or not you had any conversations with anybody at
24 Bacci Cafe regarding their machine truncating

1 numbers on either July 13, 2006 or July 14, 2006?

2 A. I couldn't tell you one way or another.

3 Q. As you sit here today, do you know whether
4 you had any conversations with anybody at the
5 processing center on July 13, 2006 or July 14, 2006,
6 regarding this particular machine?

7 A. I couldn't recall at this point, no.

8 Q. When you were working at National
9 Translink, would customers ever send in their
10 terminal for -- like physically send in their
11 terminals for reprogramming, do you know?

12 A. There is times we would pick up a terminal
13 and bring it in or they would send it in and have
14 some work done on different types of terminals.

15 Q. Were you involved in any of that sort
16 of --

17 A. No.

18 Q. -- reprogramming?

19 A. It's totally technical support.

20 Q. All right. Let's look at another set of
21 documents. We're going to mark this as Porch
22 Exhibit 5.

23

24

1 (Whereupon, a document was marked
2 Porch Deposition Exhibit 5 for
3 identification as of 1/29/09.)

4 BY MS. ARRANZ:

5 Q. Definitely look through them to see, you
6 know, if they look familiar to you, but I'm not
7 going to have you go through each and every page on
8 Exhibit 5.

9 Okay. We are looking at Exhibit 5 for
10 your deposition, and this is an Exhibit that has a
11 cover letter with no Bates stamp and then it's Bates
12 stamped SH/BA/NTC-763 through 853, and, Doug, I'm
13 referring again to those little numbers at the very
14 bottom right-hand corner of these pages.

15 I'm assuming no one has ever provided
16 these documents to you before --

17 A. No.

18 Q. -- I just handed them to you.

19 Okay. Let's look at Page 775. Okay.
20 This appears to be -- the typewritten portion of
21 this Page 775 appears to be another one of those
22 MCMTERs?

23 A. MCMTERs, correct.

24 Q. And this is with regard to Bacci Pizzeria,

1 correct?

2 A. Correct.

3 Q. Okay. And there is no date on that
4 portion of the typewritten portion of this page,
5 correct?

6 A. Correct.

7 Q. Do you know whose handwriting it is that
8 says, please -- I think it says, "Guild with tips.
9 No autobatch, thanks," and then a smiley face.

10 Do you know whose handwriting this is?

11 A. No, I don't.

12 Q. Okay.

13 MR. ANDREOLI: I think that is "build."

14 MS. ARRANZ: Oh, build. That makes sense.

15 BY MS. ARRANZ:

16 Q. Okay. So was it common, Doug, let me ask
17 you this, while you were at National Translink to --
18 if a customer called in with an issue, to print out
19 one of these MCMTERs and make handwritten notes on
20 it?

21 A. And then we send it back to technical.

22 Q. Okay. So would you only print out these
23 MCMTERs and make handwritten notes on it if it was
24 something that tech support needed to do?

1 A. For MCMTER -- MCMTER? Yes.

2 Q. Okay.

3 A. That deals with the terminal, so that
4 would all be technical support.

5 Q. Would there be times where a customer
6 would need technical support and you would not print
7 out a MCMTER and make handwritten notes on it?

8 A. Yeah, you just -- It depends on what they
9 needed. If they needed something -- This had to do
10 with what was inside their machine, you know. I --
11 We would make notes on it or if it wasn't needed, I
12 would just send them back on the phone. It depended
13 on what the problem was.

14 Q. Okay. All right. Let's look at Page 780.
15 Can you look at this page and when you are done
16 looking at the page, review it very carefully and
17 let me know what this is if you know.

18 A. These are comments to access where you
19 would order.

20 Q. I will ask you specific questions about
21 it, but I just -- Tell me what it is. I mean, look
22 at it and then tell me what it is generally
23 speaking.

24 A. It's comments for Bacci Pizzeria, and, you

1 know, actions taken on their account.

2 Q. Okay. You were talking earlier about this
3 program on your computer. It was a customer
4 database.

5 A. Correct.

6 Q. Is this Page 780, is this what the
7 database would have looked like as you sat at your
8 computer?

9 A. Yes.

10 Q. Okay. And you were saying that these are
11 comments regarding Bacci Pizzeria, correct?

12 A. Correct.

13 Q. And the notations that are made in that
14 middle portion of the Page 780, is that something
15 that would be entered into by a customer service
16 representative, like the specific entries?

17 A. Yes.

18 Q. So for example, that first entry seems to
19 indicate 5/14/04, gave discover number, VT.

20 Do you see that?

21 A. Yes, she gave them their Discover number
22 for -- Yeah, and then with her initials.

23 Q. So for each customer the comments would
24 include it looks like a date, some sort of notation

1 of what was talked about and then a person's
2 initials; is that right?

3 A. Yes.

4 Q. And separate and apart from what is on
5 780, if you made notations for a particular
6 customer, would you have then included your initials
7 of DP?

8 A. DP or Doug, D-u-g (sic). Sometimes I
9 wrote Doug.

10 Q. All right. I'm going to have you look at
11 Page 786 of Exhibit 5. In fact, I believe that Page
12 787 after that is the exact same page, but I'm going
13 to focus on 786. I just thought I would point that
14 out to you.

15 A. Okay.

16 Q. Does this appear to be -- What does this
17 appear to be to you?

18 A. Notes.

19 Q. Okay. Is this another printout of those
20 customer notes that we were looking at on the
21 previous page?

22 A. Yes.

23 Q. I'm going to focus on this page because I
24 think the other page cuts off some of the notes.

1 Let's just see here.

2 Do you know whose initials are RJV?

3 A. That would be Robert Vandross (phonetic.)

4 Q. Who is Robert Vandross (phonetic.)

5 A. The guy that worked in technical support.

6 Q. And Noel, we were talking about him
7 earlier. He was also in technical support, correct?

8 A. That's correct.

9 Q. What about FBL?

10 A. That would be Fritz. He was a customer
11 service person for a while.

12 Q. Can you look at this Page 786 and tell me
13 if you believe any of these notes were made by you.

14 A. No.

15 Q. So none of the notations that are on 786
16 were made by you, correct?

17 A. That's correct.

18 Q. If you would look at the May 1st, 2006,
19 entry made by Fritz, it says, called merchant to
20 initialize for download Hypercom T7P, as in Paul,
21 advised to press initialize. Tried three times.
22 Advised to try again this afternoon. Does not go
23 through. Told to call back.

24 Do you see that?

1 A. Yes.

2 Q. Do you, Mr. Porch, have any knowledge of
3 what that means?

4 MR. ANDREOLI: Foundation.

5 MR. NORA: Same objection.

6 THE WITNESS: Yes, he says he called the
7 merchant to initialize the download. They hit the
8 button to initialize. Advised them to press
9 initialize. They tried it three different times and
10 he said it did not go through. It did not pick up
11 the information from the other side. The machine
12 wasn't picking up the parameters.

13 BY MS. ARRANZ:

14 Q. Okay. And you said parameters. We don't
15 know what kind of initializing was done from your
16 reading of the notes from May 1st, 2006, correct?

17 A. From reading these notes, it doesn't say
18 what it was trying to pick up.

19 Q. Great. And then if you look at July 14,
20 2006, it says at 10:15 a.m, merchant had called on
21 7/13/06 at 11:15 a.m. stating that the terminal has
22 sticky buttons causing problems with transaction. I
23 called and spoke with Vince and informed him we will
24 be sending a replacement terminal to arrive Monday

1 morning. Gave to Noel C. to handle and then the
2 initials RJV.

3 Again, that is not an entry you made,
4 correct?

5 A. No.

6 Q. Do you, Mr. Porch, have any understanding
7 of what exactly that notation means?

8 MR. ANDREOLI: Foundation.

9 THE WITNESS: From what it sounds like,
10 someone spilled something on the machine to make the
11 buttons stick and we sent them another terminal so
12 they could do business.

13 BY MS. ARRANZ:

14 Q. Okay. And I think you are referring to
15 then -- and it looks like on the same date, July 14,
16 2006, it says program new terminal and sent, Noel.

17 Do you see that?

18 A. That is correct.

19 Q. And again, Mr. Vandross and Noel were both
20 individuals in technical support?

21 A. That is correct.

22 Q. And you've never been involved in
23 technical support?

24 A. No, I have not.

1 Q. Now if you look at this Page 786 in
2 comparison to that page we were looking at on
3 Exhibit No. 4. It was page --

4 MR. NORA: 48.

5 MS. ARRANZ: -- 48. Thanks. All right.
6 If you look at those two pages, it appears that this
7 entry made on July 14, 2006, regarding sticky
8 buttons and a need to send a replacement terminal,
9 that those notes were made on the same date that
10 our -- those handwritten notes on Page 48 by what
11 you believe to be somebody in Arizona, correct?

12 THE WITNESS: Correct.

13 BY MS. ARRANZ:

14 Q. Okay. Do you know what sending a
15 replacement terminal means?

16 A. Means that this one didn't work, so we
17 sent him a whole different machine according to what
18 the notes say.

19 MR. ANDREOLI: Foundation.

20 BY MS. ARRANZ:

21 Q. And you don't know the technical side of
22 it, what exactly the new terminal would --

23 A. I have no idea.

24 Q. Okay. Do you know if after July 14, 2006,

1 you had any contact with anybody at the Arizona
2 processing center regarding the Bacci Cafe account?

3 A. I couldn't recall whether I did or not.

4 Q. So you don't know one way or the other?

5 A. I don't know one way or the other.

6 Q. Okay. And after -- After July 14, 2006,
7 do you have any recollection of having personally
8 been in contact with anybody at Bacci Cafe?

9 A. No, I don't.

10 MS. ARRANZ: Those are my only questions.
11 I might have a few additional ones after these other
12 gentlemen ask you questions.

13 MR. NORA: Can we take that short break,
14 so I can make my call?

15 MS. ARRANZ: Sure.

16 (Whereupon, a brief recess was
17 taken.)

18 BY MS. ARRANZ:

19 Q. Mr. Porch, I do have a couple follow-up
20 questions.

21 A. Sure.

22 Q. I have another document for you to look
23 at. A letter was sent to Counsel in this case on
24 January 9, 2009, and it included what appears to be

1 a listing. I'm going to hand this to you. We don't
2 have extra copies, so I don't think we are going to
3 mark it as an Exhibit, but I believe all parties
4 have a copy of it, so take a look at that document.

5 In particular, I would like you to look at
6 the page that has the paper clip on it.

7 MR. NORA: Why don't we have this marked
8 as an Exhibit. The court reporter can make a copy
9 for each of us.

10 MR. ANDREOLI: I think I prefer that if we
11 are going to talk about it.

12 MS. ARRANZ: Okay. So this will be
13 Exhibit No. 6 for your deposition, Mr. Porch.

14 THE WITNESS: Okay.

15 BY MS. ARRANZ:

16 Q. And this is a set of documents, what
17 appears to be a listing, and then it's got a cover
18 letter from your attorney to counsel for the parties
19 to this lawsuit. Does this document --

20 MR. NORA: Wait. Off the record, please.

21 (Discussion had off the record.)

22 BY MS. ARRANZ:

23 Q. We'll go back on the record. Exhibit 6
24 for Mr. Porch's deposition is going to be one page

1 from this set of documents that was sent by Counsel
2 for National Translink on January 9, 2009.

3 (Whereupon, a document was marked
4 Porch Deposition Exhibit 6 for
5 identification as of 1/29/09.)

6 BY MS. ARRANZ:

7 Q. Specifically, Mr. Porch, I want you to
8 look at the fourth page here. Does this set of
9 documents appear to be that list that you were
10 referring to earlier that you received regarding
11 customers to contact regarding truncation?

12 A. Yes.

13 Q. Looking at this particular page, Exhibit
14 6, is any of handwritten notes on this page your
15 handwriting?

16 A. No.

17 Q. Okay. You will notice on the very bottom
18 or towards the bottom of that page, Exhibit 6, that
19 it says Bacci Pizzeria. Do you see that?

20 A. Yes.

21 Q. Okay. And that particular name is not
22 crossed out, correct?

23 A. It's not crossed off that I can tell.

24 There is not a line through it like the others, no.

1 Q. Okay. Do you know if you made any
2 notations that are made on Exhibit 6 including any
3 of the crossing out of names on this page?

4 A. No, that is -- None of them is my writing.

5 Q. So as you sit here today, you do not
6 believe that you made any notations on this
7 Exhibit 6, correct?

8 A. Correct.

9 Q. Do you have any understanding of what that
10 means, that Bacci Pizzeria is not crossed out on
11 Exhibit 6?

12 A. What they were referring to with the Ys
13 and the Ns, I have no idea. It doesn't say what
14 they were saying yes or no to.

15 Q. Okay. Looking at this Exhibit 6, does
16 that refresh your memory or recollection at all with
17 regard to whether or not about Bacci Pizzeria would
18 have been on your listing of customers to contact
19 regarding truncation?

20 MR. NORA: Objection to foundation.

21 THE WITNESS: I had a list that was
22 similar to this. I can't say, you know, this is
23 compiled to the same list I had. I -- Because I'm
24 not seeing that. I don't know, so I would say I

1 cannot tell by looking at this.

2 BY MS. ARRANZ:

3 Q. So you don't know one way or another as
4 you sit here today whether or not Bacci Pizzeria was
5 one of the customers on your listing that you needed
6 to contact regarding truncation, correct?

7 A. Not without seeing my list, no.

8 MS. ARRANZ: Okay. Those are my only
9 follow-up questions, but I might have more later, so
10 I will now tender you over to Mr. Nora.

11 E X A M I N A T I O N

12 BY MR. NORA:

13 Q. Mr. Porch, did you have a list like the
14 one that was in the last Exhibit you looked at?

15 A. I was given a list at one point, yes.

16 Q. And did it look like this in the format?

17 A. Yes.

18 Q. And when you had your list, were other
19 customer representatives also working with lists to
20 contact customers about --

21 A. Yeah.

22 Q. -- truncation?

23 A. And there was more than one list of the
24 same list out there.

1 Q. Okay. And so would your lists overlap in
2 terms of the names on the list for various --

3 A. Yes.

4 Q. Okay. Was Katrina in charge of making
5 sure that all the customers on the list were
6 ultimately contacted by some service representative?

7 MS. ARRANZ: Objection, foundation.

8 MR. NORA: If you know.

9 THE WITNESS: Katrina would be my
10 supervisor. If I was given it -- you know, I don't
11 know if per se she would be in charge because I know
12 that same list was given to people in technical
13 because they were doing the follow-up on it, so it
14 was pretty much a group effort. I don't think any
15 one person was in charge of it.

16 BY MR. NORA:

17 Q. Okay. Now much earlier in the deposition
18 today you were being asked questions about your
19 recollection of the time when the company was
20 telling you about these truncation requirements and
21 several of the questions were saying that it was
22 your recollection it was in mid 2006.

23 Do you remember those questions?

24 A. Yes.

1 MS. ARRANZ: I'm sorry. I think he said
2 mid 2007.

3 MR. NORA: Or mid --

4 MS. ARRANZ: But go ahead. I mean, I know
5 where you're going with it.

6 BY MR. NORA:

7 Q. It's even more important to go into it
8 now. When you were making these calls for
9 truncation that are reflected in the fax notes to
10 CardSystems that we looked at earlier, were these
11 notes made on Pages 47 and 48 made during the effort
12 to truncate customer's credit card numbers from the
13 terminals used through the --

14 A. Yes.

15 Q. Was this part of the truncation effort
16 that your company was --

17 A. Yes, that is when we had to -- That is
18 when we were doing the truncation push to get it
19 done to comply with the law.

20 Q. Okay. And this was being done after your
21 company had started instructing you on the
22 requirements of the law; is that correct?

23 A. Correct.

24 Q. So it would have been sometime before the

1 dates on these faxes that you first learned about
2 those requirements, correct?

3 A. Yes.

4 Q. And when you were -- and some time has
5 passed, but whenever they were telling you about
6 those requirements, you were given at that time
7 information respecting deadlines for compliance with
8 the law; is that correct?

9 A. Correct.

10 Q. And it was your understanding at that time
11 that the deadlines had not yet passed when Translink
12 told you about it?

13 A. Right. It was get it done. It was still
14 before the time that they -- The allotted time.

15 Q. There was still time to become compliant?

16 A. Right.

17 Q. Now when you looked at Pages 47 and 48,
18 you noted that the font type was different. I want
19 to ask you --

20 A. Let me get to --

21 Q. Take your time.

22 A. Okay.

23 Q. Now we asked you to -- or Counsel asked
24 you to look at the information in the printed

1 portion at the top of those pages and you noted that
2 the information is the same on those two pages,
3 correct?

4 A. Correct.

5 Q. Now that information respecting the
6 Hypercom terminal gives the terminal type, correct?

7 A. Correct.

8 Q. It does not give a serial number or other
9 specific identifier for the machine, does it?

10 A. Not for the machine, no.

11 Q. Are these two printouts consistent with
12 the possibility that there were two different
13 Hypercom T7 terminals at different times at this
14 location?

15 MS. ARRANZ: Objection to foundation.

16 MR. ANDREOLI: Form.

17 THE WITNESS: I can't say one way or
18 another whether it was or not because if they
19 replaced it and downloaded this in '01, it could
20 have been. I wouldn't have that knowledge.

21 BY MR. NORA:

22 Q. If truncation was ordered for a machine
23 and it failed to initialize, what would happen?

24 MS. ARRANZ: Objection to form.

1 THE WITNESS: If it wouldn't work, if they
2 couldn't get it to work, we would request that they
3 get a different terminal.

4 BY MR. NORA:

5 Q. Could they continue to use the terminal
6 before you replaced it?

7 MS. ARRANZ: Objection to form and
8 foundation.

9 THE WITNESS: If it was past the time and
10 day, they would have shut them off, but they
11 continued -- If they continued to use it, it would
12 be on them. You know, if we told them it didn't
13 work, and they used it, you know, it's -- I couldn't
14 give you -- we're using hypotheticals, so I wouldn't
15 know.

16 MR. NORA: Looking at the customer -- Let
17 me get the page.

18 Look at Page 786 again, please.

19 MR. ANDREOLI: I believe that is the other
20 one.

21 MR. NORA: Yes, sir.

22 MS. ARRANZ: Exhibit 5.

23 MR. NORA: Exhibit No. 5, Page 786.

24 THE WITNESS: Okay.

1 BY MR. NORA:

2 Q. If a customer called in with a complaint
3 like the one where he called here for a Hypercom
4 terminal, was Translink able to provide other
5 Hypercom terminals to that customer?

6 MS. ARRANZ: Objection to form and
7 foundation.

8 THE WITNESS: I would not be able to
9 recall what kind of machine they sent to them. I
10 would -- No, it doesn't, you know -- Ideally we
11 didn't have Hypercoms, you know. I'm not saying
12 that we never sent one out, but if they didn't have
13 one, I couldn't tell you one way or another.

14 BY MR. NORA:

15 Q. Let me think it through. Be patient. It
16 might be faster when I do that.

17 Earlier you were asked questions about
18 your notes from July 13th, 2006, and for the record
19 this is back on that Page 48. Your notes that said,
20 "Please truncate. Let me know when done so I can
21 have them initialize, thanks, Doug."

22 You indicated earlier that this must have
23 meant that they were having problems with the
24 truncation with the machine.

1 Do you have an independent recollection of
2 why you made these notes on July 13th, 2006?

3 MS. ARRANZ: Objection to form. Asked and
4 answered.

5 THE WITNESS: I can only tell you by
6 reading what I see here. I had sent it out to be
7 truncated and they let me know that they did their
8 end in Arizona. Whether they hit the button or not,
9 I don't know if that has to do -- anything with what
10 I see on the other page or not. It wasn't me who
11 took that call.

12 BY MR. NORA:

13 Q. Now I know you didn't make any of the
14 notations on Page 786 about the problems with the
15 terminal being sticky and a new terminal being sent
16 out. What I want to know is, though, are your notes
17 on the work you did on July 13th and the message
18 back about truncation being complete on July 14th
19 consistent with work that would have been done on a
20 new terminal being sent by Translink out to Bacci
21 when they had sticky keys around July 14th, 13th?

22 MS. ARRANZ: Objection to form and
23 foundation, and incomplete hypothetical.

24 THE WITNESS: If a new terminal was sent

1 out, I would have had nothing to do with it because
2 it would have been done by technical support and
3 been complete before it was sent out. That would
4 have been ready to go, and they would have put it in
5 notes that they sent out the terminal and it would
6 have been ready before it was shipped.

7 BY MR. NORA:

8 Q. So if the records on Page 786 are correct
9 and I know you did not make them, but if the new
10 terminal was sent out on July 14th as recorded
11 there, it would not be the machine that you were
12 working on in the notes reflected on Page 48?

13 MS. ARRANZ: Just object to foundation and
14 form.

15 THE WITNESS: This would have been a
16 separate machine than this. (Indicating.)

17 BY MR. NORA:

18 Q. Okay. And when you say, this would have
19 been a separate machine than this, the machine that
20 is described on Page 786 being sent out on July 14th
21 would have been a different machine than the machine
22 you worked on and reflected in Page 48?

23 MS. ARRANZ: Objection to foundation.

24 THE WITNESS: Correct.

1 MR. ANDREOLI: I'm just going to note for
2 the record that I am not repeating certain
3 objections that are being made by Counsel because
4 there is no need.

5 MS. ARRANZ: You join in all objections
6 stated.

7 MR. ANDREOLI: Good enough.

8 BY MR. NORA:

9 Q. Looking at Page 48, are you able to tell
10 if Translink owned that machine or if Bacci Pizzeria
11 owned that machine, meaning the terminal?

12 A. It would have been property of Bacci
13 Pizzeria. I wouldn't -- You know, we didn't own any
14 of their machines. We didn't rent out machines.
15 Either you owned the terminal or you didn't.

16 Q. When you program -- When Translink would
17 program a new terminal and send it out, would it
18 bring the old terminal back in if it did not own the
19 old terminal?

20 MS. ARRANZ: Objection to foundation and
21 form.

22 THE WITNESS: On a regular basis where
23 they would send us their old machine before we would
24 do it, we would get the machine back and we would

1 send them another machine out.

2 BY MR. NORA:

3 Q. Again, I'm going to give you a
4 hypothetical now just to know how that company
5 operated, okay? If I had a Hypercom 7 terminal that
6 I owned which I received services on from Translink,
7 and that terminal stopped working correctly and I
8 received a new terminal from Translink, would there
9 be any reason for me to return the old terminal that
10 I owned to Translink?

11 A. The way it worked, they had a replacement
12 if you were on what they called the club. It was a
13 form of insurance on your machine. You paid a
14 certain bill. Yes, they would say, send us the
15 other machine; we'll give you a replacement for your
16 machine.

17 Hypothetically speaking is what we are
18 saying, that -- That is the way it would work.

19 "Hi. My machine broke. I would like you
20 to replace it."

21 We would send a call tag. They would slap
22 it on there. We get the machine back, program them
23 another machine, send it out to them.

24 Q. And some of your customers belonged to

1 this club?

2 A. Correct.

3 Q. Do you know if Bacci Pizzeria belonged to
4 this club?

5 A. I -- No, I don't.

6 Q. If you wanted to find out if Bacci
7 Pizzeria belonged to this club, would you be able to
8 find the information in their customer file?

9 A. Yes.

10 Q. And what would you look for in the
11 customer file to see if they belonged to that club?

12 A. I would look at their statement.

13 Q. Do you have a copy of one of their
14 statements there that would give you that
15 information?

16 A. Number 37.

17 Q. That's Page 37.

18 A. Down on the bottom it shows a fee
19 structure. Under where it says basic service online
20 fee, the next line says merchant club.

21 Q. And does that indicate that Bacci Pizzeria
22 was a member of the club?

23 A. Yes. They pay 13.95 a month for paper
24 service and replacement repair on terminal.

1 Q. Do you know if Translink would have
2 replaced the Hyperlink 7 terminal with another
3 terminal should a customer --

4 A. I would have no --

5 Q. -- have a problem?

6 A. Excuse me. I'm sorry.

7 Q. That's all right.

8 A. I would have no way of knowing what kind
9 of machine they would give them.

10 Q. You don't know if it was possible or
11 consistent or anything?

12 A. Ideally, we didn't have a lot of Hypercoms
13 around. We weren't -- You know, that is not one of
14 the product line we carried. Whether they had a
15 machine there that they could revamp or -- you know,
16 I don't know, but I couldn't tell you one way or
17 another.

18 Q. If Translink were going to replace a
19 Hypercom 7 in July of when this occurred --

20 MS. ARRANZ: 2006.

21 MR. NORA: 2006, thank you. Would
22 Translink have needed to program that machine with
23 CardSystems in Arizona in order to truncate the
24 numbers?

1 MS. ARRANZ: Objection to foundation.

2 THE WITNESS: If CardSystems -- Are you
3 saying if Translink had an HT7P?

4 MR. NORA: Yes, sir.

5 THE WITNESS: They could do the download.
6 They could make the phone call before they would
7 send it out. They wouldn't make the customer do it,
8 but it would have to be done with CardSystems. That
9 is the way that program worked.

10 MS. ARRANZ: When you said they can do it,
11 who are you talking about?

12 THE WITNESS: The guys before they sent
13 the replacement machine out.

14 MS. ARRANZ: Who are those guys?

15 THE WITNESS: The technical support at
16 National Translink would have put in the -- pushed
17 the buttons they needed to and they would have
18 called Arizona after faxing everything back and
19 forth. They would have hit the initialize button,
20 made sure it worked, and then shipped it. They
21 wouldn't have shipped a machine that wasn't
22 truncated.

23 MS. ARRANZ: When you said, when they
24 shipped it, they would have shipped it back to the

1 customer is what you are saying?

2 THE WITNESS: To the customer, ready to
3 go. So they take it out of the box and plug it in.
4 Boom. They can do sales.

5 BY MR. NORA:

6 Q. I hope it's a dead horse by now, but let
7 me beat it again. Page 48, your notes there about
8 that truncation job on July 13th and 14th of 2006.

9 A. Page 48. Got it.

10 Q. Am I correct in saying that would have
11 been on a machine other than any machine sent out by
12 Translink on July 14th?

13 A. This is a machine that they had in their
14 store.

15 Q. Before July 14th?

16 A. Right. Before. Because we were trying to
17 get it to work.

18 MS. ARRANZ: I'm just going to object to
19 form and asked and answered, but he answered already
20 again.

21 BY MR. NORA:

22 Q. In your earlier remarks today when you
23 were talking about the truncation efforts and the
24 don't forget to truncate sign that you had on the

1 desk, you said the machine had to be replaced if it
2 could not truncate or it would be shut off.

3 Would you please explain to me what would
4 happen if a machine was not truncated while
5 Translink was providing these services to it?

6 A. We talked to someone. We said you have to
7 truncate your machine. If the machine was not
8 truncated and they refused to truncate it -- I have
9 had customers say, "Leave me alone. I don't want to
10 deal with that. No one gets my numbers, whatever."
11 We would shut them off on the computer to where they
12 couldn't process.

13 Q. That is what you would do if they
14 affirmatively told you they wouldn't truncate?

15 A. "I'm not going to do it and comply with
16 your rule. Leave me alone. I'm not buying another
17 machine."

18 So there was people that had the VeriFones
19 that were not able to truncate, just didn't work.
20 It couldn't, you know, only show the last four
21 numbers. We'd say, "You've got to buy a new
22 machine."

23 They'd say, "No. My machine works fine.
24 I'm not going to change it."

1 We would have to shut them off at the
2 database because they are not complying with the
3 federal law.

4 Q. Now in those cases and different cases
5 when you contacted the customer and explained to the
6 customer what had to be done and then you also made
7 arrangements with CardSystems in Arizona to prepare
8 the software download, you would next call the
9 customer so that they could call Arizona and get the
10 download, correct?

11 MS. ARRANZ: Objection to form.

12 MR. NORA: Please repeat to me what you --

13 THE WITNESS: I would call the customer
14 after I had faxed the sheet over to Arizona and they
15 got it back and said that it was -- the terminal was
16 done. Then I would call the customer and say, "Hit
17 initialize."

18 They would have to hit a button and
19 it would make a phone call to pick up the
20 parameters. If it didn't work, we would try it
21 again, hit initialize.

22 If for some reason it wasn't picking
23 up those changes, the machine needed to be replaced.

24

1 BY MR. NORA:

2 Q. Now would you stay on the phone while the
3 customer was initializing?

4 A. Most of the time they couldn't. Most of
5 the time they had one line. They had to hang up
6 their phone number and push the button because it's
7 a computer. It uses the phone line.

8 Q. Yes.

9 A. So then, you know, you would have to call
10 them back. We would run a test transaction. I
11 would give them a test card and say try this. Put
12 in, you know, one dollar. Is it showing all four
13 numbers? Yes, it -- No, it's still showing all the
14 numbers.

15 Okay. Then it didn't take it, and we
16 would have to take next steps to try and make it
17 work.

18 Q. Was it your practice to always call the
19 customer and confirm that the truncation was
20 successful?

21 A. I always called them back to see if it was
22 successful. There is other -- You know, what other
23 people did, I don't know, but tell me -- Call me
24 back if you have any problems. You know, I wouldn't

1 say that that never happened, but with me it was
2 always a call back. If you couldn't get a hold of
3 them -- you know, it's a business.

4 Q. Uh-huh.

5 A. Call somebody back and they are on the
6 phone, you know, you go to the next and you try. I
7 wouldn't say -- in a perfect world. I couldn't say
8 every time, every call.

9 Q. Do you know if there were customers that
10 Translink failed to contact respecting the
11 truncation effort?

12 A. I don't know one way or another. I'm --
13 You know, I can't say for sure, yes, there was
14 people. No, I don't know.

15 Q. Was there any way Translink had of knowing
16 if truncation had not been implemented at a
17 customer's point of service?

18 MR. ANDREOLI: I'm going to object to the
19 form.

20 MS. ARRANZ: I will join.

21 THE WITNESS: Not that I -- You know, not
22 that I can say, you know. Nothing on a database
23 that I knew. I couldn't push a button and say, oh,
24 their machine is not truncated.

1 BY MR. NORA:

2 Q. It would have to be brought to Translink's
3 attention somehow as far as you know?

4 A. Correct.

5 Q. At the time you were doing the truncation
6 efforts in 2006 when the sign was on the desk and
7 you were making these calls, who were the other
8 customer service representatives that you recall
9 working at Translink at that time?

10 A. At that time I believe it would be
11 Katrina, myself, Fritz, Autumn, which is also they
12 handled -- The risk people handled customer service
13 phone calls. Autumn, Jennifer, Nina and Lisa.

14 Q. Now on the calls that were made -- the
15 originating calls, if you will. The first calls to
16 the customers to alert them to the truncation
17 requirements, were those made by both risk
18 management and customer service representatives or
19 just customer service representatives or others?

20 A. At that point -- and I remember this. We
21 were all given -- Here is a page for you, a page for
22 you, a page -- you know, so it was a group effort.
23 I believe I said that before. It was a group
24 effort. Everybody was told, here, these people need

1 to be contacted.

2 Q. Now you said technical support people also
3 are making calls. Were they making the originating
4 calls first alerting the customers to the truncation
5 requirements?

6 A. The first calls came from customer
7 service. You know, tech support would do the
8 follow-up calls. You know, I can't speak for what
9 they did. I know everybody had their hand in having
10 to do this.

11 Q. But the first calls would have been from
12 Katrina, yourself, Fritz, Autumn, Jennifer, Nina
13 and --

14 A. The list was handed out to the customer
15 service and risk department.

16 Q. Okay. So the people you have given me in
17 risk and in customer service --

18 A. Correct.

19 Q. -- would have been the people making the
20 originating calls?

21 A. Correct.

22 Q. And I didn't get the last name. Nina
23 and --

24 MS. ARRANZ: Lisa.

1 MR. NORA: Lisa, right?

2 THE WITNESS: Nina and Lisa.

3 MR. NORA: I was starting to read Libby
4 with my handwriting, so thanks for clarifying.

5 When you were setting up the
6 truncation, am I correct in my understanding that
7 you would have never called Arizona CardSystems to
8 set up truncation with Bacci Pizzeria unless you had
9 already talked to Bacci Pizzeria regarding that
10 truncation requirement?

11 MS. ARRANZ: Objection to form and asked
12 and answered.

13 THE WITNESS: They would have had to have
14 the initial phone call besides, hey, we need to get
15 your machine in compliance and then we would have
16 called Arizona. I wouldn't have just called Arizona
17 without knowing that there had to be something done.

18 BY MR. NORA:

19 Q. I wanted to get the times straight again
20 on your fax memo.

21 A. What number are you looking at there?

22 Q. 47, sir.

23 A. Okay.

24 Q. Page 47. Let me finish. When you wrote

1 down April 28, 2006, Friday, 10:55 a.m, is that the
2 time of the fax transmission you made or some other
3 item?

4 A. That is when I initially did the call. It
5 just says, fax. I can't tell you what time I faxed
6 it.

7 Q. Okay. So the time 10:55 a.m. is the time
8 you first called CardSystems, correct?

9 A. Correct.

10 Q. And the fax would have been after that
11 telephone conversation, correct?

12 A. Correct.

13 Q. And this first conversation at 10:55 a.m,
14 April 28, 2006, would have been after a phone call
15 to Bacci Pizzeria informing them of the truncation
16 requirements, correct?

17 MS. ARRANZ: Objection to form.

18 THE WITNESS: I would have talked to them,
19 yes. I would have talked to them before I faxed
20 this off.

21 BY MR. NORA:

22 Q. You would have done that call, correct?

23 A. If I was doing the faxing, I would have
24 had to talk to them, correct.

1 Q. And when you say had to talk to them, you
2 mean have to talk to the people at Bacci Pizzeria?

3 A. I had to talk --

4 MS. ARRANZ: Objection to form.

5 THE WITNESS: -- to the customer, correct.

6 MR. NORA: Okay. That is all.

7 F U R T H E R E X A M I N A T I O N

8 BY MS. ARRANZ:

9 Q. Doug, one follow-up question on that same
10 page that you've been looking at regarding your
11 notes from April 2006. You stated that you believe
12 that you would have had to have contact with
13 somebody at Bacci regarding truncation on that date,
14 but as you sit here today, you have no recollection
15 of specifically talking to someone?

16 A. Yeah, I can't tell you that I remember the
17 exact conversation. I am speculating by looking at
18 this.

19 I would have -- I wouldn't have faxed
20 MCMTER without talking to somebody. I can't recall
21 the exact conversation. I can't tell you who I
22 talked to or when it happened on that day.

23 MS. ARRANZ: Great. Thank you.

24 MR. NORA: Thanks very much.

1 MS. ARRANZ: Do you want to waive or
2 reserve signature?

3 MR. ANDREOLI: Can we go off the record.

4 (Discussion had off the record.)

5 MR. ANDREOLI: We are going to waive.

6 (AND FURTHER DEPONENT SAITH NOT)

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1 STATE OF ILLINOIS)
) SS.
2 COUNTY OF W I L L)

3

4 I, Donna L. Volante, a Certified Shorthand
5 Reporter for the State of Illinois, do hereby
6 certify that DOUGLAS ALAN PORCH was first duly sworn
7 by me to testify to the truth; that the above
8 deposition was recorded stenographically and reduced
9 to typewriting by me; and that the foregoing
10 transcript of the said deposition is a true and
11 correct transcript of the testimony given by the
12 said witness at the time and place previously
13 specified.

14 I further certify that I am not counsel
15 for nor in any way related to any of the parties to
16 this suit, nor am I in any way interested in the
17 outcome thereof.

18 In witness whereof, I have hereunto set my
19 hand this 23rd day of February, 2009.

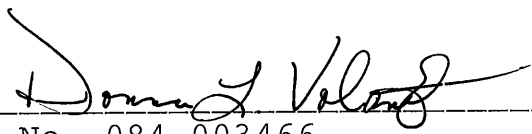
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CSR No. 084-003466
My Commission expires 5/31/2009.

-	111/13 113/21 117/6	arrive [1] 87/24
-- [286]	allotted [1] 97/14	aside [1] 61/23
-vs- [1] 1/7	almost [1] 74/19	ask [14] 4/10 4/10 4/16 5/7 5/9
A	alone [2] 109/9 109/16	35/13 54/16 54/22 68/2 71/3 82/16
a -- [3] 42/12 42/24 43/17	already [4] 60/20 65/11 108/19	83/20 90/12 97/19
A-l-a-n [1] 3/5	115/9	asked [11] 4/10 14/18 19/13 23/9
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